

1 LUIS GALLEGOS
Oklahoma Bar No. 19098; lgallegos@ftc.gov
2 REID TEPFER
Texas Bar No. 24079444; rtepfer@ftc.gov
3

4 Federal Trade Commission
1999 Bryan St., Suite 2150
5 Dallas, TX 75201
Phone: (214) 979-9383 (Gallegos)
6 Fax: (214) 953-3079

7 *Attorneys for Federal Trade Commission*

8
9 **UNITED STATES DISTRICT COURT**
10 **DISTRICT OF NEVADA**

11 Federal Trade Commission,
12
13 Plaintiff,
14 vs.
15 Superior Servicing, LLC, et. al.,
16 Defendants.
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Case No.: 24-CV-2163

**JOINT STIPULATION FOR A STAY
OF BRIEFING, DISCOVERY, AND
OTHER DEADLINES IN LIGHT OF
LAPSE OF APPROPRIATIONS**

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21 The Federal Trade Commission (“FTC” or “Commission”) and Defendant
22 Merdjanian hereby move for a temporary stay of all briefing, discovery, and other
23 deadlines in this case. In support of this motion, counsel for the FTC states as
24 follows:
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26 1. On September 26, 2025, the Court entered a Scheduling Order that set out
27 various deadlines related to this matter. Dkt 90.
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1 2. At the end of the day on September 30, 2025, the continuing resolution that
2 had been funding the FTC expired, and appropriations to the FTC lapsed. The FTC
3 currently lacks appropriated funds to continue operating, and does not know when
4 funding will be restored.

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6 3. Absent an appropriation, FTC attorneys and other employees are prohibited
7 from working, even on a voluntary basis, except in very limited circumstances,
8 including “emergencies involving the safety of human life or the protection of
9 property.” 31 U.S.C. § 1342.
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12 4. Undersigned counsel for the FTC and counsel for Defendant Merdjanian
13 therefore request that the Court stay all deadlines in this case until Congress has
14 restored appropriations to the FTC.
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16 5. If this motion for a stay is granted, undersigned counsel for the FTC will notify
17 the Court as soon as Congress has appropriated funds for the FTC. The Commission
18 and Defendant Merdjanian request that, at that point, all current deadlines for the
19 parties be extended commensurate with the duration of the lapse in appropriations.
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21 6. Defendant Merdjanian’s counsel has authorized counsel for the FTC to state
22 that they are in agreement with this stipulation.
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1 Therefore, although we greatly regret any disruption caused to the Court and the
2 other litigants, the FTC and Defendant Merdjanian hereby stipulate to a stay of
3 briefing, discovery, and other deadlines in this case until FTC attorneys are permitted
4 to resume their usual civil litigation functions.
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9 **IT IS SO ORDERED.**

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12 **Hon. Maximiliano D. Couvillier III United States**
Magistrate Judge

13 **DATED:** 10-2-25
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1 Respectfully submitted:

2 **FOR PLAINTIFF:**

3 **FEDERAL TRADE COMMISSION**

4 /s/ Luis H. Gallegos

Date: October 1, 2025

5 Luis H. Gallegos, Oklahoma Bar No. 19098
6 Reid A. Tepfer, Texas Bar No. 24079444
1999 Bryan St., Suite 2150
Dallas, TX 75201
7 (214) 979-9383; lgallegos@ftc.gov
(214) 979-9395; rtepfer@ftc.gov
8 Fax: (214) 953-3079

9 **FOR DEFENDANT MERDJANIAN:**

10 /s/ Rowland Graff

Date: October 1, 2025

11 R. CHRISTOPHER READE, ESQ.
Nevada Bar No. 006791
12 P. ROWLAND GRAFF, ESQ.
Nevada Bar No. 015050
13 CORY READ DOWS & SHAFER
1333 North Buffalo Drive, Suite 210
14 Las Vegas, Nevada 89128
Telephone: (702) 794-4411
15 Facsimile: (702) 794-4421
rgraff@crdslaw.com
16 Attorneys for Defendant
DENNISE MERDJANIAN

CERRTIFICATE OF SERVICE

I, Luis H. Gallegos, hereby certify that I electronically filed the foregoing with the Court using CM/ECF.

Dated: October 1, 2025

/s/ Luis H. Gallegos
LUIS H. GALLEGOS
Attorney for Plaintiff
Federal Trade Commission

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